

I am submitting this comment in support of Hands On Video Relay Service's petition filed March 31, 2004, seeking a declaration that the costs of providing video mail be compensated. The comment is being submitted on behalf of the Deaf Counseling, Advocacy and Referral Agency, Inc. DCARA is a community-based organization providing various social services to deaf and hard-of-hearing people in the San Francisco Bay Area and the North Coast of California. It is the largest such agency in Northern California and has provided services for over 40 years under the philosophy "of, by and for" the deaf and hard of hearing.

DCARA urges the Commission to reimburse Video Relay Service providers for their costs to offer video mail as a feature of VRS. The Commission has already recognized that voice mail is a feature of TRS that provides greater functional equivalency for deaf and speech-impaired users of TRS. For those deaf individuals who depend on VRS for their telephone calls with hearing parties, video mail similarly provides greater functional equivalency. Voice mail and leaving voice messages is ubiquitous for the hearing population. Voice mail and video mail are functionally equivalent and only differ in their transmission format.

Providing reimbursement for the costs of video mail is fully consistent with the Commission's rule that TRS providers must be capable of handling any type of call as well as the ADA's directive that the Commission's TRS rules are to encourage the use and adoption of new technologies. Video mail is a prime example of a new technology that enhances the functional equivalency of relay services. Without it, the many deaf people who have low English literacy are either left without full understanding of text messages or worse, those who call them are discouraged from leaving any messages beyond name and number no matter the importance or emergency. They are being unnecessary and unfairly excluded from the full benefits of our telecommunication system.